



September 26, 2011

Ms. Judith A. Enk
Administrator
Region 2, USEPA
290 Broadway
New York, NY 10007-1866

Dear Ms. Enk:

CETCO is a wholly owned subsidiary of Amcol International (\$852M, NYSE:ACO), and a world leader in sediment technology and remediation, with multiple proven remediation products is partnering with Pear Technology, an experienced innovative soil washing technology company. Our purpose in addressing this letter to you is to offer an alternative and cost effective approach for the remediation of the Lower Passaic River, namely a complete team with both technology and multi- million dollar contracting capabilities

Pear Technology is a startup company that we became aware of during our search for a soil cleaning business with a proven commercial process. As you may be aware, Europe is very aggressive about cleaning up its polluted sites to re-use its scarce land for productive economic development purposes. Soil washing rather than dig and bury techniques is far preferable and has become a priority in most countries.

Virtually every remediation bid process we enter into in Europe requires companies, like ours, to have the capability to perform soil washing. This is why we decided to partner with Pear Technology. Our reasoning was simple. They and their operation's subcontractor, Groundwater Treatment and Technology of New Jersey, were the persons who finalized the cleanup of BASF's Kearney contaminated site using their soil washing technology (see letter from BASF). As a result, BASF received a certificate of no further action from the NJ Department of Environmental Protection on this site.

As you know, soil washing has not taken hold in the US the same way it has in Europe and other parts of the world. There are many reasons for this that are not important to recite here. We, as a company, are committed to making soil washing a key component of our remediation services and believe that support for this in the US from governmental agencies, like USEPA, are necessary to convince PRPs that this methodology is far better than dig and bury or encapsulation techniques that are more expensive, although quick and dirty.



We are aware of other efforts in soil cleaning and offer no comment on their capabilities. What we do suggest is that there is enough work for many such companies to be at work at the same time throughout the US. No one company can do it all. However, we do believe that we at CETCO have a deep bench and a long track record of success in performing under our contracts and meeting specifications and deadlines – all important criteria for those who award us contracts for remediation.

This dynamic and financially responsible team is respectfully requesting to be included as a contracting entity for the upcoming lower Passaic River restoration pilot program.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Archie Filshill". The signature is stylized with long, sweeping strokes.

Archie Filshill
President
CETCO Contracting Services Company